



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

Mr. Richard J. Cook, Director
Environment & Safety Department
6801 Industrial Road
Springfield, VA 22151

MAY 18, 1995

Re: Washington Gas & Light (WGL) Property (Site) at 1200 "N"
Street, SE, Washington, D.C.

Dear Mr. Cook:

Thank you for the opportunity to review and comment on the following documents pertaining to the release of hazardous substances at the above referenced facility:

- Contamination & Land Use Study - Phase II, Vols. 1 and 2, June 20, 1989, prepared by Hydro-Terra, Inc.
- East Station - Phase III, Groundwater Recovery System, August 20, 1991, prepared by GeoTrans, Inc.
- Technical Review of Site Investigations and Remedial Activities - National Park Service Property (NPS), March 17, 1994, prepared by ICF Kaiser Engineers
- Preliminary Investigation of Possible Subsurface Contamination - East Station, prepared by Hydro-Terra, Inc.

While the Site is currently not on the National Priorities List (NPL), we recognize and appreciate the initiative undertaken by WGL to begin remedial actions prior to listing and providing the following comments for your consideration to help further your efforts:

Hydrogeologic Concerns

Previous ground water investigations and the proposed ground water remedial actions appear to be adequate to draw some conclusions on the potential for impact from Site contaminants on the Anacostia River. Dredging activities must be limited because of the presence of the contaminated confined sand and gravel aquifer beneath the river. This unit must not be cut into by dredging operations. If the unit is breached, a significant release to the river may occur.

1. The goal of the ground water remedial action is to prevent ground water, contaminated by Site activities, from entering the Anacostia River. Within this broad goal, the objectives of the action should be to contain the migration of free product, to remove to the extent practicable any free product, to remediate the dissolved plume to acceptable levels and to eliminate the migration of any contamination into the river.

2. The performance criteria for the ground water action needs to be a demonstrated gradient control, not a pumping rate. This will require observing ground water levels in all monitoring and extraction wells. These data will be utilized to construct piezometric maps of both the shallow fill and buried sand and gravel aquifer. These maps will be employed to verify that all contaminated ground water is being captured by the extraction system, and that there are no gaps between extraction well capture zones.

3. Performance monitoring will require the observation of capture zone development around each extraction well. This will entail the separate start up of each extraction well. The capture zone for each individual extraction well needs to be determined at the designed pump rate. This monitoring may require that additional monitoring wells be added to the monitoring network.

4. Chemical monitoring needs to include one complete round of sampling from all monitoring and extraction wells, before the startup of the extraction system. Ground water should be analyzed for organic and inorganic contaminants. This data can be used as baseline to evaluate the system. Future rounds of chemical sampling may be limited to a site-specific target list. It is recommended that quarterly monitoring be done for the first three years followed by semi-annual monitoring for two and annual monitoring there after.

Care should be taken to avoid collecting turbid samples. It is recommended that low flow pumps be used in well purging and sampling. This method will avoid the mobilization of sediments within the aquifer. If redevelopment of wells is necessary, it is recommended that surging or over-pumping methods be used. The methods of redevelopment described in the text are well purging methods not development.

5. A possible modification to the proposed design is to reinject a portion of the treated water, surfactant, or steam into the deep sand and gravel aquifer. This could be done either by utilizing Holder 01 or by installing an injection well system. Reinjection will enhance the recovery of free product from this aquifer. Injection may also be appropriate for the fill aquifer.

6. Another possible alternative for the sand and gravel aquifer is to install a grout curtain within this zone downgradient of the tar plume, in the area south of Water Street. This barrier will contain the free product tar plume. The dissolved plume south of the barrier could be cleaned to an appropriate level to allow discharge to the river. Free product north of the grout curtain could be removed to the extent practicable with additional extraction and injection wells. It may also be advisable to seal the sand and gravel aquifer in the area of Holder 01. This would completely seal the confined aquifer and facilitate the largest volume of free product removal.

7. In Section 8.2.3.5. Selective Excavation of Contaminated Soils, on Pg. 110 of the 6/89 Hydro-Terra document, the discussion focuses on placing contaminated excavated soils in Holder 04. If this action is anticipated, it may violate RCRA's hazardous waste disposal requirements.

Toxicological Concerns

1. Insufficient data is provided in the reports for EPA to adequately assess the merits of the risk assessments proposed. In an effort to assist the Agency in completing its review, we request a copy of the QA packages prepared by your contractors in order to confirm conclusions drawn in the various documents reviewed.

2. Future land use is a central issue. Without reasonable certainty that the property will be used for industry, EPA assesses risks based upon future residential use. The lack of adequate justification in the documents reviewed raises strong concerns regarding the assertion of future industrial land use.

First, "reasonable certainty" needs to be documented in much more detail than these reports contain. Acceptable documentation includes such things as past land use in the area, zoning restrictions on this and adjacent lots, population growth trends in the area, trends in residential growth, local government plans for the area, and so on. Upon request, Region III can provide copies of approved future use documentation reports that can serve as examples.

Second, future land use is properly a risk management decision which is beyond the scope of technical support. This decision should be made by the consensus of EPA, State and local government agencies, and the interested public (including the owners). EPA clearly needs to consider these opinions before determining if such use is reasonable.

Finally, the use to which the Park Service intends to put the adjacent parcel also influences the risk and, potentially, the cleanup decision. The documents do not discuss this at all.

3. The 1989 risk assessment does not comply with current EPA guidance in a number of areas. The 1995 ICF Kaiser analysis of this earlier work still falls short of adequately addressing many of the earlier deficiencies.

a. The 1989 document eliminates noncarcinogenic PAHs and volatiles from consideration on the assumption that these substances are unlikely to pose a problem. While this may be true, it is unproven by the documentation provided.

b. The report does not consider potential exposures to construction workers on the assumption that such exposures are too short to matter. This is also unproven, and given the profound subsurface contamination, also unlikely.

c. EPA's understanding of the ground water to surface water calculations is that it was assumed (1) the recovery well and trench capture the entire plume of dissolved aromatics and (2) mixing in the river is complete. These assumptions seem unduly optimistic and need further justification.

d. Many of the 1995 risk-based soil screening values (Table 2-1, ICF Kaiser report) for PAHs are inaccurate. This report should use Region III's risk-based concentrations (RBCs) for all ground water contaminants which lack ARARs. A copy is enclosed.

e. The 1989 report documents the calculation of the exposure concentrations but not the exposure scenarios. It is, therefore, impossible to reproduce any of the risk estimates.

In summary, EPA suggests that the following additional information be provided in order for us to properly evaluate the conclusions and recommendations proposed for this site:

1. A detailed description of reasonably likely future uses containing the types of information described above. This description should evaluate both the probability that the land could be residential, and that the groundwater could be used as a potable water source.

2. Recalculations of groundwater movement from the site to the river, based on a reinterpretation of the groundwater data and an acceptable model.

3. A new risk assessment which includes (1) inhalation, dermal contact, and incidental soil ingestion by construction workers, and (2) recreation contact by users of the NPS parcel and Anacostia River.

Ecological Concerns

1. Because of concerns expressed in some of the documents regarding the quality of the analytical data, its value in assessing ecological issues is questionable. The Technical Review of Site Investigations and Remedial Activities - National Park Service Property (March 1994) appears to summarize these deficiencies. As stated on page E-3 of Appendix F, Phase II does not provide much of the necessary information (i.e., method detection limit studies, etc.) and some holding times (5-10 samples) were exceeded. The concentrations and detection limits for the samples are considered estimates, and were used with other data to assess this Site.

2. No aquatic or terrestrial ecological characterizations were provided in the documents. There was also extremely limited information regarding the sediment (i.e., total organic carbon (TOC) and grain size). The Contamination and Land Use Study Phase II, Appendix H states that RS-3 has either a cement base (page 5) or a cobble gravel substrate (page 2) and sample location RS2 has a coarse gravel substrate. The substrate of the samples is very important when analyzing for contamination. In general, the coarse gravel samples would not catch contamination which would be caught up in fine sediments. When sampling sediment, EPA recommends using a 63 micron sieve. It is unclear what methods were used for these samples. The sediment samples were also taken one month apart. Sediment samples RS-1 thru RS-7 analyzed for organics were taken on August 30, 1988 and the remaining five were taken on September 21, 1988. Ideally, it is recommended that samples be taken at the same time starting at the downstream locations. Metals do not appear to have been analyzed for in sediment samples, although some metals were found in site soils and ground water samples at concentrations that may have an adverse effect on ecological receptors (see below).

3. Below are the some of the contaminants that may be of potential concern in sediments to ecological receptors based on table F-3 of the Phase II study. All data are ppb.

Contaminant	ER-L	ER-M	RS-3	RS-10	RS-11	RS-12
Naphthalene	160	2100	ND		250	
Acenaphthene	16	500	25	82	160	22
Fluorene	19	540		48	130	
Phenanthrene	240	1500			360	
Anthracene	85.3	1100			120	

While none of the sediment samples exceeded the effects range median ER-M values, further discussion is necessary to explain why these contaminants may not present a threat to the ecology in the area since many exceeded their ER-L values.

4. The soil data provided in the Phase II study are also very limited. The WGL property was divided into 3 sampling areas and the surface soil samples were composited within each area. EPA does not approve of compositing, except as a screening tool, since it may mask contamination. There are also no location maps, individual data on each sampling location, or detection limits provided. Based on Table F-2, most of the VOCs, chromium, copper, and silver exceed the Canadian Criteria¹. Some of the pesticides and PCB levels are also elevated above the Canadian Criteria. EPA requests a copy of the actual laboratory data for the individual surface soil samples.

5. Page 24 of the Phase II study states that "surface drainage on the East Station property is southward toward Water Street and southwest toward the 12th street storm sewer. All former storm sewers on the WGL property were destroyed during the demolition of the plant. As a result, stormwater runoff flowing southerly on the plant property moves mostly overland to the river." In addition to preventing the ground water from reaching the river and contributing to the degradation of the river, surface runoff should also be prevented. All pathways for site-runoff should also be sampled, evaluated and mapped.

6. Documents state that sources other than the ground water are likely to be causing some of the elevated levels found in the investigation. The presence of elevated concentrations of organic contaminants in the vicinity of the pump house is believed to be due, in large part, to river releases resulting from boating activities at the Corps of Engineers' wharf, past spillage of petroleum fuels associated with the off-loading of these products from barges at the WGL and Steuart Petroleum piers, and possibly, spillage of tar at the WGL pier prior to 1948 when it was also used to load tar onto barges. Additional releases of oil near the seawall probably occurred in the 1960's and 1970's and were caused by breaks in buried oil lines on the East Station Property. These other sources should be investigated further, especially since the river is tidal and the assumption that the contaminants may be from upstream sources may not be reasonable.

7. The Phase II document also states that the "Contaminant plume in the shallow-fill soil is about 1,000 feet wide near the river and that contaminants found in coal tar and petroleum oils are

¹ Ministry of the Environment. 1989; Criteria for Managing Contaminated Sites in British Columbia

present in river sediment near the seawall. The highest concentrations were found in front of the 12th street sewer outfall and upstream opposite Corps of Engineers' property and the properties leased by WGL and Steuart Petroleum. Significantly lower concentrations are found in the area lying between the sewer outfall and the Corps of Engineers' property

where less permeable soils are present behind the seawall. More permeable fill is found near the sewer outfall and a deep scour channel lies in front of the outfall." Based on the documents, it appears that the investigators assumed that most of the contamination is captured by the recovery trench. More recent data and a clearer summary should be provided on this issue.

8. Three water samples were taken from the 12th street sewer to determine if ground water is entering the sewer via breaks or through joints in the pipes. Because these samples were collected after a rain event, the conclusions drawn regarding the infiltration of ground water into the sewer system is questionable.

9. The placement of clean soil on unpaved areas on East Station property should be followed by establishment of an effective cover of vegetation. The selective excavation of contaminated soil as suggested in the Phase II report may be beneficial since it could help to reduce some of the contaminant levels.

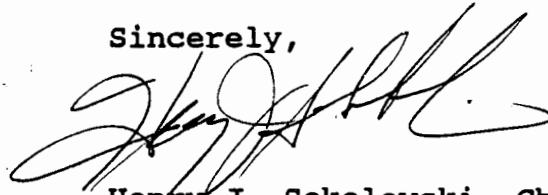
In summary, EPA suggests the following:

1. As discussed above, additional data on sampling locations, methods, sediment TOC and grain size should be provided.
2. The inactive on-site sewers should be discussed in greater detail, since they may have or still do provide pathways to the river.
3. None of the documents adequately assesses ecological risk. The Site was not even discussed from a habitat point of view. Further information as discussed in section 2.11 on page 2-30 of the Technical Review is necessary before EPA can determine the merits of the conclusions made. In addition, a screening level ecological risk assessment should also be conducted (see EPA Region III's Draft Ecological Risk Assessment Guidelines-Screening assessment enclosed).
4. Impact to ecological receptors should be clearly evaluated based on the actual data of the ground water treatment.
5. Any further action should include eliminating site wastes from entering the river (i.e., selective excavation placing clean soil and revegetating unpaved areas, etc).

In order to foster the spirit of cooperation and to expeditiously and effectively pursue the remediation of this Site, EPA requests an opportunity to meet in the Philadelphia Regional Office with representatives from both your company and the National Park Service. The Agency is making itself available towards the end of this month. At your convenience, please contact Mr. Nicholas DiNardo so that a mutually agreeable date for this meeting can be formalized. Mr. DiNardo's telephone number is (215) 597-7858.

Thank you for your time and consideration to this matter.

Sincerely,



Henry J. Sokolowski, Chief
Federal Facilities and
Site Assessment Branch

Enclosures

cc: J. Hewitt, NPS
D. Campbell, DCERA-Haz Waste
N. DiNardo, EPA
B. Mykijewycz, EPA
B. Okorn, EPA
B. Rundell, EPA
R. Smith, EPA
J. Hargett, EPA
L. Nurse, EPA

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
ENVIRONMENTAL REGULATION ADMINISTRATION
HAZARDOUS WASTE MANAGEMENT BRANCH

D.C. LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

INSPECTOR NAME(S) Mark Hughes

INSPECTION DATE: 01/17/95

I. FACILITY INFORMATION:

Facility Name Washington Gas Light Co.

Address 1200 N Street, S.E.

EPA Identification No. DCD 077 797 793

Representative Mr. Krishna Murthy

Facility Work Activities and Existing Processes Wastewater treatment and soil remediation.

Generation Points Within the Facility Wastewater treatment unit and soil borings from throughout the facility.

II. COMPLIANCE STATUS:

1. GENERAL REQUIREMENTS (GGR)

Generator identified all hazardous waste streams generated at the facility? X Yes No

Any facility information changed since the Notification (8700-12) was completed? X Yes No

2. MANIFEST (GMR)

Manifest system currently in operation and manifests maintained on site? X Yes No

Generators correct name, address, telephone number and EPA ID number on the manifest? X Yes No

Name and EPA ID number of each transporter included on the manifest? X Yes No

TSD facility which receives the hazardous waste identified by name, address and EPA ID number? X Yes No

included on the manifest form?

X Yes No

Description on the manifest of the hazardous waste to be treated, stored or disposed?

X Yes No

Quantity of each waste stream and the type and number of containers on the manifest?

X Yes No

All of the appropriate signatures on the manifest?

X Yes No

Can the generator verify that there is a program in place to reduce the volume and/or toxicity of waste generated at the installation?

X Yes No

Generator mailing copies of the manifest to the Hazardous Waste Management Branch?

X Yes No

3. PRE-TRANSPORT (GPT)

Hazardous waste being stored on site for less than 90 days?

X Yes No

Accumulation start date of waste clearly marked on each container?

X Yes No

At the time of accumulation, are containers clearly labeled as "Hazardous Waste"?

X Yes No

Hazardous waste containers kept closed and in good condition (no corrosion, leakage, or structural defects)?

X Yes No

Facility personnel completed a program of training in hazardous waste management procedures?

X Yes No

Facility maintains a record of the job titles and descriptions for personnel involved with hazardous waste management?

X Yes No

Facility has an internal communications or alarm system for emergencies?

X Yes No

Device at the generation points capable of summoning emergency assistance?

X Yes No

Fire control equipment and an adequate supply of water or fire suppressing chemicals available?

X Yes No

Adequate aisle space to allow unobstructed movement of personnel and equipment during emergencies?

X Yes No

FEDERAL LQG, House Change in LLD to LQG

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type	
DCID: 0177797793		LDF [] TSF [] INC [] LOG <input checked="" type="checkbox"/> SQG [] CEG [] TRA []	
Handler Name		Contact Name	Date Submitted
WASHINGTON Gas Light Co		KRISHNA MARTHY	01/19/95
Street		City	
1200 N STREET S.E.		WASH DC 20003	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
Date	Number	Agency	Type
01/17/95		S	CEI
Reason	Branch	Person	
	D.C.	M.W.H.	

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER	GPT	GBF	TWD	DQS	DLT	DPB	DWP
GGR	GRR	TGR	DCH	DGW	DMC	DPP	DBF
GLB	GSC	TMR	DCL	DIN	DMR	DSI	CAS
GMR	GSO	TOR	DCP	DLB	DOR	DTR	FEA
GOR	GEX	TRR	DFR	DLF	DOT	DTT	CSS

Comments: No Violations Observed, Federal LQG

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION									
Agency	Number	Area	Date Determined		Agency	Number	Area	Date Determined	

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
Date Determined	Priority	Branch	Person	Returned to Compliance
				Scheduled Actual
Comments				

VIOLATION	Add	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
Date Determined	Priority	Branch	Person	Returned to Compliance
				Scheduled Actual
Comments				

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by E

b. TCA (Toxicity Characteristic Leaching Procedure)
list the restricted wastes identified by both
methods (attach a copy of the lab report).

E. Have any waste streams been misclassified?
____ Yes X No

F. Does the generator have all the appropriate
notifications/certifications for all restricted wastes
generated on site? X Yes ____ No

G. If yes, does all of the applicable information
(manifest #s, waste streams and quantities) match with
the information on the manifests? X Yes ____ No

H. Have all treatment standards been tabulated for all the
corresponding waste streams? X Yes ____ No

I. Have any of the treatment standards been exceeded for
any of these waste streams? ____ Yes X No

If yes, please explain:

J. Has the appropriate treatment method been utilized?
 X Yes ____ No

K. Comments: No violations observed.

with hazardous waste emergencies? ☒ Yes ☐ No

Contingency plan contains a description of emergency procedures personnel will implement? ☒ Yes ☐ No

Contingency plan describes formal arrangements with police, fire departments, hospitals etc.? ☒ Yes ☐ No

Contingency plan lists names, addresses and phone numbers of the Emergency Coordinators and a means of contacting them on a 24 hour basis? ☒ Yes ☐ No

Floor plan of the facility showing the generation points and the location of emergency equipment? ☒ Yes ☐ No

Evacuation plan which indicates the personnel mobilization mechanisms and assembly areas? ☒ Yes ☐ No

4. RECORDKEEPING (GRR)

Generator keeps manifests on site for the required period? (Reg=3 yrs, LDR=5yrs) ☒ Yes ☐ No

Generator has copies of exception reports when manifests indicate the need? ☒ Yes ☐ No

Generator has a copy of the Annual Report? ☒ Yes ☐ No

III. COMMENTS AND DETAILS OF VIOLATIONS OBSERVED:

No violations observed. Generator is a federal LOG.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
ENVIRONMENTAL REGULATION ADMINISTRATION
HAZARDOUS WASTE MANAGEMENT BRANCH

LAND DISPOSAL RESTRICTION CHECKLIST

INSPECTORS NAME Mark Hughes

TITLE Environmental Chemist

DATE 01/17/95

I. GENERATOR IDENTIFICATION:

- A. Generator Name Washington Gas Light Co.
- B. Generator Address 1200 N Street, S.E.
- C. Generator's type of operation Gas company remediation
of contaminated groundwater and soil.
- D. EPA ID # DCD 077 797 793
- E. Contact person and phone number Krishna Murthy
(703) 750-5605

II. GENERATOR COMPLIANCE:

- A. Does the generator treat waste on site?
X Yes No
- B. Were treatment residuals generated from RCRA exempt
units or processes? X Yes No
If yes list type of treatment units and processes.
Groundwater pump and treat unit. Contaminated
activated carbon filters and soil borings generated.
- C. Does the generator dispose of waste on site?
 Yes X No
- D. Has the facility identified its restricted hazardous
wastes based on:
a. Knowledge of wastes X

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)
NOV 4 1991
REC'D

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

DCD077797793

II. Name of Installation (Include company and specific site name)

WASHINGTON GAS LIGHT CO

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1200 N STREET, S.E.

Street (continued)

City or Town

WASHINGTON

State

DC

ZIP Code

20003-

County Code

County Name

001 District of Columbia

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

6801 INDUSTRIAL ROAD

City or Town

SPRINGFIELD

State

VA

ZIP Code

22151-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

MURTHY

(first)

KRISHNA

Job Title

MANAGER

Phone Number (area code and number)

703-750-5605

VI. Installation Contact Address (See Instructions)

A. Contact Address

Location

☐

Mailing

☒

B. Street or P.O. Box

6801 INDUSTRIAL ROAD

City or Town

SPRINGFIELD

State

VA

ZIP Code

22151-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

WASHINGTON GAS LIGHT CO

Street, P.O. Box, or Route Number

6801 INDUSTRIAL ROAD

City or Town

SPRINGFIELD

State

VA

ZIP Code

22151-

Phone Number (area code and number)

703-750-5605

B. Land Type

P

C. Owner Type

P

D. Change of Owner

Indicator

Yes No

(Date Changed)

Month Day Year

-- -- -- -- --

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
1. Generator (See Instructions)	<input checked="" type="checkbox"/>	1. Off-Specification Used Oil Fuel	<input type="checkbox"/>
a. Greater than 1000kg/mo (2,200 lbs.)	<input type="checkbox"/>	a. Generator Marketing to Burner	<input type="checkbox"/>
b. 100 to 1000 kg/mo (220 - 2,200 lbs.)	<input type="checkbox"/>	b. Other Marketer	<input type="checkbox"/>
<input checked="" type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)	<input type="checkbox"/>	c. Burner - indicate device(s) - Type of Combustion Device	<input type="checkbox"/>
2. Transporter (Indicate Mode in boxes 1-5 below)	<input type="checkbox"/>	1. Utility Boiler	<input type="checkbox"/>
a. For own waste only	<input type="checkbox"/>	2. Industrial Boiler	<input type="checkbox"/>
b. For commercial purposes	<input type="checkbox"/>	3. Industrial Furnace	<input type="checkbox"/>
Mode of Transportation	<input type="checkbox"/>	2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification	<input type="checkbox"/>
1. Air	<input type="checkbox"/>		
2. Rail	<input type="checkbox"/>		
3. Highway	<input type="checkbox"/>		
4. Water	<input type="checkbox"/>		
5. Other - specify	<input type="checkbox"/>		

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

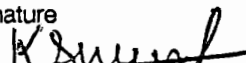
1	2	3	4	5	6
D 0 0 1	F 0 0 3	F 0 0 5			
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature 	Name and Official Title (type or print) Krishna S. Murthy	Date Signed 8/15/91
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Comments

Since 1985, Washington Gas Light Co. occasionally disposed of the
(unregulated) hazardous waste, using DCP#000000665.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)